

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

**INSTITUTIONAL RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORIES  
(NNA/USPS-1 through 2)  
(April 13, 2012)**

The United States Postal Service hereby provides the responses to the above-listed interrogatories of the National Newspaper Association, which were filed on March 30, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 13, 2012

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORIES**

**NNA/USPS-1**

Please refer to the Postal Service's filing of June 25, 2010 in Docket RM 2010-11 titled UNITED STATES POSTAL SERVICE RESPONSE TO ORDER NO. 465 AND REQUEST FOR SEMI-PERMANENT EXCEPTIONS FROM PERIODIC REPORTING OF SERVICE PERFORMANCE MEASUREMENT, pages 7 to 10 and respond to the following questions:

- a. Does the Postal Service still believe measurement of Periodicals as a total class provides an adequate proxy for measurement of Within County Periodicals service performance?
- b. Does the Postal Service still believe Within County Periodicals are less likely than Outside County Periodicals to be able to make the transitions to bar-coding that would enable product measurement?
- c. Does the Postal Service have any data to demonstrate the percentage of mail undergoing manual handling in the Within County product class that consists of newspapers? If so, please provide those data. If not, does the Postal Service believe newspapers constitute all or almost all of the product class?

**RESPONSE**

- a. The Postal Service has no new information to indicate that measurement of Periodicals as a total class is not an adequate proxy for measurement of Within County Periodicals.
- b. Yes, Within County Periodicals may not be included in service measurement if they are not barcoded.
- c. No, the Postal Service does not have data to demonstrate the percentage of mail undergoing manual handling in the Within County product. The Postal Service does not have sufficient data to support a belief as to whether or not newspapers constitute "all or almost all" of Within County Periodicals.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**NNA/USPS-2**

Please review the Postal Services filing of July 10, 2010, in Docket RM 2010-11 entitled UNITED STATES POSTAL SERVICE NOTICE OF FILING SUPPLEMENTAL INFORMATION that contained the report entitled, "Community Newspapers Study Highlights" and respond to the following questions:

- a. Please confirm that the report was prepared by the Global Business Services division of IBM under the Postal Service's direction.
- b. Please confirm that the study leading to the report was conducted in 2008 in cooperation with the National Newspaper Association.
- c. Please confirm that the start-the-clock critical entry time used in this study was 5 p.m.
- d. Has the Postal Service done any analyses since the conclusion of this study of potential outcomes if a test were made using earlier critical entry times?
- e. Please refer to p. 10 of the report. Confirm that the average on-time arrival of Periodicals reported in this study was
  - a. 82.2% on time for Within County Periodicals destined for within county addresses
  - b. 65.85% for addresses outside the county but within the mailer's market
  - c. 58.38% for addresses outside the county but within the postal area
  - d. 54.19% on time for addresses outside the county and outside the postal area.
- f. Please confirm that the report stated that the mailer's choice of containers (i.e. sacks, pallets, tubs, etc) did not establish a clear relationship to the service times.
- g. Please refer to p. 18. Confirm that while Destination Entry Within County Periodicals had similar on-time scores to Outside County Periodicals, the on-time scores for Origin Entry mail were 60.52% and 68.11% respectively.
- h. Please refer to p. 23. Confirm that the report suggested using Outside County Periodicals scores as a proxy for Within County Periodicals.
- i. Please refer to p. 23. Confirm that the report suggested considering another study in "a few years." Has the Postal Service considered another study?

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**RESPONSE**

- a. Confirmed.
- b. Confirmed. Members of the National Newspaper Association cooperated with the study.
- c. Confirmed.
- d. The Postal Service has performed no additional analyses.
- e.
  - a. Confirmed.<sup>1</sup>
  - b. Confirmed.
  - c. Confirmed.
  - d. Confirmed.
- f. Confirmed.
- g. Confirmed.
- h. No. The report states that “Periodicals could be considered as a proxy for Community Newspapers Mail.” The report does not suggest using Outside County Periodicals scores as a proxy for Within County Periodicals.
- i. Confirmed. No.

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<sup>1</sup> Throughout interrogatory NNA/USPS-2, NNA mistakenly indicated the preceding page of the referenced report. Thus NNA’s reference to page 10 should actually be page 11, NNA’s reference to page 18 should actually be page 19, and NNA’s reference to page 23 should actually be page 24. The Postal Service also notes that for clarification of the record, the referenced report was filed July 9, 2010 not July 10, 2010 as indicated in the interrogatory.